

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JONATHAN GAVRIELOF,

Defendant.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2/29/24

**SUPERSEDING INFORMATION**

S3 23 Cr. 110 (MKV)

**COUNT ONE**  
**(Conspiracy to Commit Health Care Fraud)**

The United States Attorney charges:

1. From at least in or about 2017 through at least in or about 2023, in the Southern District of New York and elsewhere, JONATHAN GAVRIELOF, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit health care fraud, in violation of Title 18, United States Code, Section 1347.

2. It was a part and an object of the conspiracy that JONATHAN GAVRIELOF, the defendant, and others known and unknown, knowingly and willfully would and did execute, and attempt to execute, a scheme and artifice to defraud a health care benefit program, and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347, to wit, GAVRIELOF conspired with others to charge Medicaid and Medicare for illegally-sourced, black market prescription HIV medication that was distributed to patients.

(Title 18, United States Code, Section 1349.)

**FORFEITURE ALLEGATION**

3. As a result of committing the offense alleged in Count One of this Information, JONATHAN GAVRIELOF, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

*Damian Williams*  
DAMIAN WILLIAMS  
United States Attorney